

RECEIVED MAR 04 2013

February 27, 2013

Douglas Bergstrom, Principal  
Braun Intertec Corporation  
11001 Hampshire Avenue South  
Minneapolis MN 55438

RE: Construct Lowertown Ballpark on former Diamond Products site, 310 5<sup>th</sup> St. E.  
St. Paul, Ramsey County  
SHPO Number: 2013-0116

Dear Mr. Bergstrom:

Thank you for the opportunity to comment on the above project. It is being reviewed according to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

Regarding archaeological survey and evaluation responsibilities, we have reviewed a document dated 1/23/2013 by Laurie Ollila at Summit Envirosolutions, "Addendum for the Historic Resources Review and Assessment for the Lowertown Ballpark Project." It includes information from geotechnical borings, historic Sanborn maps, and other data gathered through preliminary cultural resources review. There is also an earlier "Historical Review/Site History" prepared by Summit in 2011. Our comments are provided below:

1. The information contained in the two Summit documents provides good background for the upcoming Phase I survey (see items 2 and 3, below). We agree with Summit's recommendation that the survey work should be focused north of 5<sup>th</sup> Street, because the analysis conducted to date shows that the area to the south of 5<sup>th</sup> Street is substantially disturbed.
2. At earlier stages of project development, as well as in phone and e-mail contacts with our office, suggestions were made by consultants that construction monitoring would be used for portions of the project area, rather than prior survey. We would like to state for the record that construction monitoring is not an appropriate method for site identification. It is possible that monitoring could be used later if further investigation or mitigation is needed. This would depend on the results of the Phase I survey.
3. The required Phase I archaeological survey should be conducted under the direction of a Principal Investigator who meets the US Secretary of the Interior's Standards for Historical Archaeology, and who has experience with urban archaeology.
4. Given the tight schedule proposed for this project, and the potential complexity of the issues, we recommend that the Principal Investigator prepare a research design and work plan in advance, and submit the plan for our review as soon as possible. This will ensure that we agree on the proposed methods and scope before the fieldwork begins. If it would be helpful in expediting this review, our archaeologist David Mather is willing to visit the site while the fieldwork is underway. If appropriate, the consulting archaeologist can specify an appropriate time, or times, for this site visit in the work plan.

Regarding above-ground historical resources, your letter noted that this project may "possibly" be subject to review under the Minnesota Historic Sites Act. That law is triggered whenever a state funded or permitted project will affect properties listed in the State or National Register of Historic Places. While the project site itself

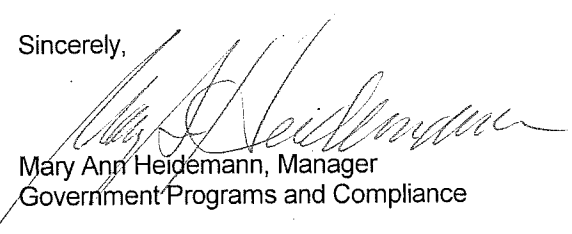
(the Diamond Products Building) is not listed in the Register, the site is immediately adjacent to the Lowertown Historic District, which is listed in the National Register. Effects covered by the law can be direct or indirect. In this case, there are several potential indirect effects on the Lowertown Historic District that need to be addressed, as noted below.

5. The design of the ballpark and supporting site development will need to meet the Secretary of Interior Guidelines for new construction within or adjacent to an historic district. This does not mean creating a (false) historic design, but it does mean seeking a design language that is compatible with the adjacent historic buildings, including concern for materials, scale, massing and design articulation. Our general practice is to review the design work at the 30, 60 and 90 percent complete phase, although a different schedule can be devised to better fit your project requirements, as necessary.
6. Several other potential indirect effects on the Lowertown District were mentioned in the July 22, 2011 Summit report, including traffic, noise and lighting issues. We agree that these effects need to be examined.
7. The end result of review under the Minnesota Historic Sites Act is a written agreement on what constitutes appropriate treatment to avoid or minimize any adverse effects to historic resources. The agreement is reached between the responsible State Agency (or delegated representative) and the Minnesota Historical Society. To avoid confusion, please be aware that preparation of an EAW under the Minnesota Environmental Rights Act does not automatically fulfill requirements of the Minnesota Historic Sites Act because they are two separate laws. However, materials prepared for an EAW may provide some of the information needed to address potential direct or indirect effects under the Minnesota Historic Sites Act.

Finally, we are aware that the National Historic Preservation Act does not, at this time, apply to the project because no federal funding or permitting is involved. Therefore our comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and implementing regulations at 36 CFR 800. If this project is considered for federal assistance at a later time, or requires a federal license or permit, it should be submitted to our office by the responsible federal agency.

We fully understand that this is a large, complex project on the fast track. Therefore, if you have any questions regarding our review, now or in the future, please do not hesitate to contact me at (651) 259-3456. Please keep us informed about your schedule. Once the required survey, evaluation and design materials are submitted to us, we will do what we can to help expedite our reviews to meet pertinent project deadlines. Feel free to send items as they are available. We can do a step-by-step phased review, if that helps keep the project on schedule.

Sincerely,



Mary Ann Heidemann, Manager  
Government Programs and Compliance

cc: Summit Envirosolutions  
Connie Christenson, DEED  
City of St. Paul  
St. Paul HPC